

Date: 03/28/2011 05:30 PM
From: Carol Campbell/R8/USEPA/US
To: Steve Wharton, Ketellapper.Victor,
Murray.Bill, Pennock.Sonya
Subject: Fw: OU-5 contaminated bark

fyi

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----- Forwarded by Carol Campbell/R8/USEPA/US on 03/28/2011 05:30 PM -----

From: DC Orr <xcav8orr@hotmail.com>

To: Carol Campbell/R8/USEPA/US@EPA, Rebecca Thomas/R8/USEPA/US@EPA

Date: 03/28/2011 03:49 PM

Subject: FW: OU-5 contaminated bark

Date: Mon, 28 Mar 2011 15:44:55 -0600

Subject: Re: OU-5 contaminated bark

From: tony.ward@mso.umt.edu

To: xcav8orr@hotmail.com; tspear@mtech.edu

Hi DC,

We have done some work in Libby looking at the potential for exposure when asbestos-contaminated trees are disturbed. From a firewood harvesting study we carried out several years ago near the mine, we were able to demonstrate that disturbing asbestos contaminated trees does create the potential for airborne exposures.

Though we haven't done any activity based sampling specifically with asbestos-contaminated tree bark in piles, I would think that disturbing this material could generate exposures. If these piles have indeed been shown to be contaminated with asbestos, my opinion is that this material should not be used under swing sets, etc.

Tony Ward

The University of Montana

406-243-4092

On 3/28/11 6:20 AM, "DC Orr" <xcav8orr@hotmail.com> wrote:

Dr. Ward;

I am a City Councilman in Libby who has been receiving reports about bark from the piles at OU-5, the old Stimson industrial property. I used to sit on the

Community Advisory Group (CAG) and remember that we discussed your work concerning bark with EPA OSC Paul Peronard. This would have been, maybe, in 2005?

A homeowners group recently sent information that shows EPA performed some "qualitative" testing on the mountain of sawdust left behind when the Stimson mill closed.

The tests EPA has released show that one sample, tested with PLM, contained an asbestos fiber. One out of twenty samples. When EPA switched to TEM sampling, they had four hits, including the one sample that had a hit with PLM according to Ms. Pennock of EPA.

This seems to differ from the Remedial investigation for OU-5 which states in Sec. 5.5 (LA IN BARK WASTE) "Of the 19 bark samples analyzed, LA was detected in one sample analyzed by PLM, and LA was detected in 13 samples by TEM".

It seems EPA performed no quantitative analysis on the bark.

I'm just a layman, Dr. Ward, but it seems that this coincides with some of your studies. I would read this to say that PLM is a useless tool for this material but it obviously releases fibers when disturbed that can be detected by TEM. A ton of fibers.

The homeowners have been successful in attracting media attention to this issue. Some are concerned that EPA let this bark leave OU-5 by the semitruckload for years. There are unconfirmed reports that the bark was shredded and mixed with clay to meet organic specs for use as topsoil in restoration on projects in Libby. I know personally that it has been used for landscaping all over Libby.

I checked around yesterday and found OU-5 bark at OU-1 and OU-2 which have Records of Decision. It has been used at City Hall and the Cemetery, various landscape islands in town, including our Gateway Eagle. It is at each of our remaining schools. At restaurants, churches, parks, banks, even our new Credit Union. It was used in large amounts on the recent Golf Course Project. It is in yards and gardens and childrens play areas. This mountain of material has been moved out of OU-5 and placed all over this town. Some has left Libby.

Do you see any problem with using this material under swingsets, in yards where it will be mowed, where it will be tracked into homes and businesses?

I don't believe the EPA has your level of expertise in these matters and want to ensure that you are aware of the problem. I hope you will weigh in with an opinion and some information on the history of your work in Libby.

Thank you for your concern in this important matter.

Sincerely, DC Orr

